

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 15  
: :  
PERFORADORA ORO NEGRO S. DE R.L. : Case No. 18-11094 (SCC)  
DE C.V., *et al.* : (Jointly Administered)  
: :  
Debtors in a Foreign Proceeding. :  
: :  
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**DECLARATION OF ANDREW N. ROSENBERG  
IN SUPPORT OF OBJECTION OF THE INTERESTED  
PARTIES TO MOTION FOR LEAVE TO FILE UNDER SEAL**

I, Andrew N. Rosenberg, declare and state as follows:

1. I am a member of the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”), an international law firm with its principal offices at 1285 Avenue of the Americas, New York, New York 10019, counsel for Alterna Capital Partners LLC (“Alterna”), Contrarian Capital Management, LLC (“Contrarian”), and AMA Capital Partners, LLC (“AMA”) (collectively, the “Interested Parties”) in the above-captioned case.

2. I respectfully submit this declaration in support of the *Objection of the Interested Parties to Motion for Leave to File Under Seal* (the “Objection”)¹ filed substantially contemporaneously herewith.

3. Attached as Exhibit 1 is a true and correct copy of the *Concurso* Court’s December 27 Order, which is dated as of December 27, 2018. Attached as Exhibit 1-T is a certified translation of the same order.

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¹ Capitalized terms used but not otherwise defined herein shall have the meanings provided in the Objection.

4. Attached as Exhibit 2 is a true and correct copy of Quinn Emanuel's Email, dated as of June 11, 2019.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: June 18, 2019  
New York, New York

PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP

/s/ Andrew N. Rosenberg  
Andrew N. Rosenberg